



CDSS

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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

January 9, 2018

Ann Edwards, Director
Sacramento County Department of
Human Assistance
2433 Marconi Avenue
Sacramento, CA 92503

Dear Ms. Edwards:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of September 11 thru September 15, 2017. Enclosed is the final report on the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with ADA website accessibility, we also require the CAP to be submitted electronically as a Word document via email at crb@dss.ca.gov.

We will provide a copy of your report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>.

If you need technical assistance in the development of your CAP, please feel free to contact Jaime Urquizo at (916) 654-2101. You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

Original signed by Lee Macias

Lee Macias, Manager
Civil Rights Unit
Family Engagement and Empowerment Division

Enclosure

c: Dawn Mason, Civil Rights Coordinator

Kim McCoy Wade, Chief
CalFresh Policy Bureau

Carlos Ocampo, Chief
Field Operations Bureau

Tami Gutierrez, Chief
CalFresh Management Operations Section

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Antoinette Dozier
Western Center on Law and Poverty

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
Sacramento County Department of
Human Assistance**

**Conducted on
September 11 thru September 15, 2017**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 8-16-70
Sacramento, CA 95814
(916) 654-2107**

Reviewer: Jaime Urquizo

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess Sacramento County Department of Human Assistance with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on July 31, 2017 through August 4, 2017. An exit interview was held on August 4, 2017, to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Susie Gaines - Mitchell Office	2450 Florin Road	Calworks and Calfresh	Spanish
Research Office	3960 Research Drive	Calworks and Calfresh	Spanish
Rancho Cordova Office	10013 Folsom Blvd	Calworks and Calfresh	Spanish
28th Street Office	1725 28th Street	Calworks and Calfresh	Spanish

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the **2017-2018** Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
 - Survey of civil rights coordinator
 - Survey of program managers
 - Case file reviews
 - Facility inspections
 - Discussion with community advocate groups. In this review the following organization(s) were contacted for feedback.
- First 5 Sac
2750 Gateway Oaks Drive, Suite 330
Natomas, CA 95833
(916) 876-5865 Fax: (916) 876-5877
Email: First5Sac@Saccounty.net
- NAMI Sacramento
3440 Viking Drive, Suite 125
Sacramento, CA 95827-2844
(916) 364-1642
Email: office@namisacramento.org

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Program Accessibility for Clients with Disabilities (physical, mental, learning, visual or hearing impairment, etc.)
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	31	25
Receptionist/Screeners	9	7
Total	40	32

Civil Rights Coordinator and Program Manager Surveys

Program Manager surveys distributed	4
Civil Rights Coordinator surveys received	1
Total Number of surveys received	5

Reviewed Case Files

English speakers' case files reviewed	10
Non-English or limited-English speakers' case files reviewed	120
Languages of clients' cases	Spanish
Reasonable Accommodation Cases	2

Sections III through IX of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section X evaluates the county's Call/Service Centers services provided to non-English speaking clients and clients with a disability.

Section XI reviews the county's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section XII highlights issues pointed out by Community Input and summarizes Reviewer Observations.

Section XIII of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Comments
Does the county accommodate clients by flexing/extending their hours or allowing applications to be mailed in?	X		
Can clients, including those with disabilities, access services when unable to go to the office?	X		
Does the county ensure the awareness of available services for individuals in remote areas?	X		

Signage, posters, pamphlets	Yes	No	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 8/16)?	X		

Signage, posters, pamphlets	Yes	No	Comments
Is the pamphlet distributed and explained to each client at intake and re-certification?	X		
Is the current version of Pub 13 available in Arabic, Armenian, Cambodian, Chinese, English, Farsi, Hmong, Japanese, Korean, Lao, Mien, Portuguese, Punjabi, Russian, Spanish, Tagalog, Ukrainian, and Vietnamese?	X		
Is the Pub 13 available in large print (English and Spanish), CD, and Braille?	X		
Were the current versions of the required posters present in the lobbies?	X		
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X		

B. Corrective Actions

None

C. Recommendation

None

The county is required to use the latest version of each of the referenced documents. For your information, the most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	06/11
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact the Civil Rights Bureau to receive the most recent versions, or download the Pub 13 from the CRB website

<http://www.cdss.ca.gov/civilrights/entres/forms/English/pub13.pdf>.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

1. Facility Location: Susie Gaines-Mitchell Bldg - 2450 Florin Rd, Sacramento, CA

Facility Element	Findings	Corrective Action
Parking	One (1) parking lot sign at entry to parking lot, missing tow company and telephone numbers.	<p>An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8) pg.170</p> <p>The additional sign shall not be less than 17" wide x 22" high. Fig. 4 (CA T24 11B-502.8.1) pg. 170</p> <p>The additional sign shall clearly state in letters with a min. height of 1" the following: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____." (CA T24 11B-502.8.2) pg. 170</p>

Facility Element	Findings	Corrective Action
		<p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign.</p> <p>(CA T24 11B-502.8.2) pg.170</p>
Parking	All disable parking lines need to be repainted.	<p>Parking space min. dimensions: 9' wide by 18' long. Fig 9</p> <p>(CA T24 11B-502.2) (ADA 502.2) pg. 174</p> <p>Access aisle min. dimensions: 5' wide by 18' long.</p> <p>Fig. 9 (CA T24 11B-502.2) (ADA 4.6.3) pg. 174</p> <p>Access aisles shall adjoin an accessible route.</p> <p>(CA T24 11B-502.3) (ADA 502.3) pg. 173</p> <p>Two parking spaces shall be permitted to share a common access aisle.</p> <p>(CA T24 11B-502.3) (ADA 502.3) pg. 173</p> <p>Access aisles serving car and van parking spaces shall be 5' wide min.</p> <p>(CA T24 11B-502.3.1) (ADA 502.3.1) pg. 173</p>

Facility Element	Findings	Corrective Action
		<p>Access aisles shall extend the full required length of the parking spaces they serve.</p> <p>(CA T24 11B-502.3.2) (ADA 502.3.2) pg. 173</p>
<p>Wheel stops to prevent the encroachment of vehicles into the accessible path of travel?</p>	<p>Accessible route is encroached when some vehicles park beyond the 5 feet width requirement.</p> <p>The wheel stop does not stop the vehicle before encroaching the access route.</p> <p>The wheel stop is not off-centered to stop the tires and vehicle to travel into the accessible route.</p>	<p>A curb or wheel stop shall be provided if required to prevent encroachment of vehicles over the required clear width of adjacent accessible routes.</p> <p>Fig. 6 (CA T24 11B-502.7.2) pg. 172</p>
<p>Men's bathroom - Is there proper signage on the wall for permanent identification?</p>	<p>Disabled sign on the wall missing.</p>	<p>The symbol shall be mounted at 58" min. and 60" max. above the finish floor or ground surface measured from the centerline of the symbol.</p> <p>(CA T24 11B-703.7.2.6) pg. 310</p> <p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall.</p> <p>(CA T24 11B-703.4.2) (ADA 703.4.2) pg. 311</p>

Facility Element	Findings	Corrective Action
Men's bathroom - Is there proper signage on the wall for permanent identification?	Disabled sign on the wall missing.	<p>The symbol shall be mounted at 58" min. and 60" max. above the finish floor or ground surface measured from the centerline of the symbol.</p> <p>(CA T24 11B-703.7.2.6) pg. 310</p> <p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall.</p> <p>(CA T24 11B-703.4.2) (ADA 703.4.2) pg. 311</p>
Men's Bathroom - Pipes under sink securely insulated?	Men's bathroom three (3) sink pipes are not wrapped appropriately with insulated material	<p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg. 330</p> <p>There shall be no sharp or abrasive surfaces under lavatories and sinks.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg. 330</p>
Women's Bathroom - Pipes under sink securely insulated?	Women's bathroom three (3) sink pipes are not wrapped appropriately with insulated material	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise

Facility Element	Findings	Corrective Action
		<p>configured to protect against contact.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg. 330</p> <p>There shall be no sharp or abrasive surfaces under lavatories and sinks.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg. 330</p>
Client Interview Rooms:	One designated disabled interview Room 47 – knee clearance was short at 6 inches.	<p>Where knee clearance is required under an element as part of a clear floor space, the knee clearance shall be 11” min. deep at 9” above the finish floor or ground and 8” min. deep at 27” above the finish floor or ground.</p> <p>(CA T24 11B-306.3.3) (ADA 306.3.3) pg. 216</p> <p>Knee clearance shall be 30” min. wide.</p> <p>(CA T24 11B-306.3.5) (ADA 306.3.5) pg. 216</p>
Client Interview Rooms:	One designated disabled interview Room 40 – knee clearance was short at 6 inches.	<p>Where knee clearance is required under an element as part of a clear floor space, the knee clearance shall be 11” min. deep at 9” above the finish floor or ground and 8” min.</p>

Facility Element	Findings	Corrective Action
		<p>deep at 27" above the finish floor or ground.</p> <p>(CA T24 11B-306.3.3) (ADA 306.3.3) pg. 216</p> <p>Knee clearance shall be 30" min. wide.</p> <p>(CA T24 11B-306.3.5) (ADA 306.3.5) pg. 216</p>
<p>Client Rooms: If there is signage, is the signage compliant? Signage to be 40" max</p>	<p>Designated Disabled sign for Rooms 40 and 47 are not at appropriate height.</p>	<p>Installation height above finished floor shall be 40" max. Please see Table 57-5.</p> <p>(CA T24 11B-703.5) (ADA 703.5) pg. 379</p>
<p>Client Rooms:</p>	<p>Fingerprint room: Table knee clearance was short at 6.5 inches.</p>	<p>Where knee clearance is required under an element as part of a clear floor space, the knee clearance shall be 11" min. deep at 9" above the finish floor or ground and 8" min.</p> <p>(CA T24 11B-306.3.3) (ADA 306.3.3) pg. 216</p> <p>Knee clearance shall be 30" min. wide.</p> <p>(CA T24 11B-306.3.5) (ADA 306.3.5) pg. 216</p>

Facility Element	Findings	Corrective Action
Client Rooms: If there is signage, is the signage compliant? Signage to be 40" max	Designated Disabled sign for Resource Room is not at appropriate height.	Installation height above finished floor shall be 40" max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379

a. Recommendation

Submit a Corrective Action Plan and Correct all items identified

2. Facility Location: Research 3960 Research Drive, Sacramento CA

Facility Element	Findings	Corrective Action
Parking	Two (2) parking lot signs at entry to parking lot, missing tow company and telephone numbers.	An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8) pg.170 The additional sign shall not be less than 17" wide x 22" high. Fig. 4 (CA T24 11B-502.8.1) pg. 170 The additional sign shall clearly state in letters with a min. height of 1" the following:

Facility Element	Findings	Corrective Action
		<p>“Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner’s expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____.” (CA T24 11B-502.8.2) pg. 170</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign.</p> <p>(CA T24 11B-502.8.2) pg.170</p>
Parking	Two (2) Disabled Parking Access Aisles have a ramp encroaching into the asphalt parking surface.	<p>Access aisles shall not overlap the vehicular way.</p> <p>(CA T24 11B-502.3.4) (ADA 502.3.4) pg. 176</p> <p>Curb ramps and the flared sides of curb ramps shall be located so that they do not project into vehicular traffic lanes, parking spaces or parking access aisles. Fig. 5 (CA T24 11B-406.5.1) (ADA 406.5) pg. 196</p>

Facility Element	Findings	Corrective Action
Client Lobby	Service Center phone signage not in threshold language.	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language.</p> <p>(Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40" max. Please see Table 57-5.</p> <p>(CA T24 11B-703.5) (ADA 703.5) pg. 379</p>
Client Lobby	Fiscal Window signage not in threshold language.	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language.</p> <p>(Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40" max.</p>

Facility Element	Findings	Corrective Action
		<p>Please see Table 57-5.</p> <p>(CA T24 11B-703.5) (ADA 703.5) pg. 379</p>
Client Lobby	<p>Emergency Exit Only sign not in threshold language.</p> <p>.</p>	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language.</p> <p>(Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40" max. Please see Table 57-5.</p> <p>(CA T24 11B-703.5) (ADA 703.5) pg. 379</p>
Interview Room	<p>One (1) Designated Disabled Room did not have adequate turnabout for a wheelchair at 5'</p>	<p>Where the accessible route makes a 180° turn around an element which is less than 48" wide, clear width shall be 42" min. approaching the turn, 48" min. at the turn and 42" min. leaving the turn.</p> <p>(CA T24 11B-403.5.2) (ADA 403.5.2) pg. 207</p>

Facility Element	Findings	Corrective Action
		<p>The turning space shall be a space of 60" diameter min. (CA T24 11B-304.3.1) (ADA 304.3.1) pg. 208</p> <p>The turning space shall be a T-shaped space within a 60" x 60" min. square with arms and base 36" wide min. (CA T24 11B-304.3.2) pg. 208</p>
Men's Bathroom	One (1) sink pipe assembly under the sink is not securely insulated?	<p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg. 330</p> <p>There shall be no sharp or abrasive surfaces under lavatories and sinks.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg. 330</p>

a. Recommendation

Submit a Corrective Action Plan and Correct all items identified

3. Facility Location: **Rancho Cordova** - 10013 Folsom Blvd, Sacramento, CA

Facility Element	Findings	Corrective Action
Interview Room	Two (2) Designated disabled conference rooms - signs not in threshold language.	<p>Installation height above finished floor shall be 40" max.</p> <p>Please see Table 57-5.</p> <p>(CA T24 11B-703.5) (ADA 703.5) pg. 379</p>
Interview Room	Two (2) Designated disabled interview rooms - signs not in threshold language.	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language.</p> <p>(Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40" max.</p> <p>Please see Table 57-5.</p> <p>(CA T24 11B-703.5) (ADA 703.5) pg. 379</p>

a. Recommendation

Submit a Corrective Action Plan and Correct all items identified

4. Facility Location: **28th Street** - 1725 28th Street, Sacramento, CA

Facility Element	Findings	Corrective Action
Parking	One (1) parking lot sign at entry to parking lot, missing tow company and telephone number.	<p>An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8) pg.170</p> <p>The additional sign shall not be less than 17" wide x 22" high. Fig. 4 (CA T24 11B-502.8.1) pg. 170</p> <p>The additional sign shall clearly state in letters with a min. height of 1" the following: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____." (CA T24 11B-502.8.2) pg. 170</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2) pg.170</p>

Facility Element	Findings	Corrective Action
ANNEX: Entrance Accessible signage?	ADA Accessible sign not available at entry to the Annex.	<p>In existing buildings and facilities where not all entrances comply with Section 33, Doors, Doorways and Gates, entrances complying with Section 33, Doors, Doorways and Gates shall be identified by the International Symbol of Accessibility complying with "International Symbol of Accessibility" heading in Section 57, Signs & Identification.</p> <p>(CA T24 11B-216.6) (ADA 216.6) pg. 28</p>
ANNEX: Lobby Pub13 in all required languages? Arabic Armenian Cambodian Chinese English Farsi Hmong Japanese Korean Lao	Publication 13's unavailable at the Lobby Counter	<p>Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall be made available in all CWD waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility. The pamphlets shall be in the primary languages of the CWD's applicant/recipient population including alternate formats (e.g., cassette tapes, large print, etc.).</p> <p>(Div. 21-107.221)</p>

Facility Element	Findings	Corrective Action
Mien Portuguese Punjabi Russian Spanish Tagalog Ukrainian Vietnamese (18 languages)		
ANNEX: Lobby - Pub 13 available in large print (06/11), Braille (12/04), audio (05/01)?	Braille Publication 13's unavailable at the Lobby Counter	Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall be made available in all CWD waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility. The pamphlets shall be in the primary languages of the CWD's applicant/recipient population including alternate formats (e.g., cassette tapes, large print, etc.). (Div. 21-107.221)
ANNEX: Interview Room	Annex A room - sign too high at 64"	Visual characters shall be 40" min. above the finish floor or ground.

Facility Element	Findings	Corrective Action
		(CA T24 11B-703.5.6) (ADA 703.5.6) pg. 376
ANNEX: Interview Room	Annex B room - sign too high at 64"	Visual characters shall be 40" min. above the finish floor or ground. (CA T24 11B-703.5.6) (ADA 703.5.6) pg. 376
ANNEX: Men's Bathroom	Five (5) sink pipes are not insulated correctly	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. (CA T24 11B-606.5) (ADA 606.5) pg. 330 There shall be no sharp or abrasive surfaces under lavatories and sinks. (CA T24 11B-606.5) (ADA 606.5) pg. 330
ANNEX: Women's Bathroom	Five (5) sink pipes are not insulated correctly	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. (CA T24 11B-606.5) (ADA 606.5) pg. 330

Facility Element	Findings	Corrective Action
		<p>There shall be no sharp or abrasive surfaces under lavatories and sinks.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg. 330</p>
<p>MAIN BLDG: Accessible counter and tables (28 – 34” high)?</p>	<p>Fiscal windows a/b/c/d counters <u>too high</u> – no higher than 34” max for disabled clients needed.</p>	<p>A portion of the counter surface that is 36” long min. and 34” high max. above the finish floor or ground shall be provided.</p> <p>(CA T24 11B-904.4.2) (ADA 904.4.2) pg. 62</p> <p>Knee and toe space complying with Section 32, Clear Floor or Ground Space for Wheelchairs shall be provided under the counter</p> <p>(CA T24 11B-904.4.2) (ADA 904.4.2) pg. 62</p> <p>A clear floor or ground space complying with Section 32, Clear Floor or Ground space for Wheelchairs shall be positioned for a forward approach to the counter</p> <p>(CA T24 11B-904.4.2) (ADA 904.4.2) pg. 62</p>

Facility Element	Findings	Corrective Action
MAIN BLDG:	Room 6 Disabled Accessible sign too high at 50" height.	Visual characters shall be 40" min. above the finish floor or ground. (CA T24 11B-703.5.6) (ADA 703.5.6) pg. 376
MAIN BLDG:	Room 7 Disabled Accessible sign too high at 48" height.	Visual characters shall be 40" min. above the finish floor or ground. (CA T24 11B-703.5.6) (ADA 703.5.6) pg. 376
MAIN BLDG: MENS BATHROOM	Five (5) sink pipe assemblies under the sink is not securely insulated?	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. (CA T24 11B-606.5) (ADA 606.5) pg. 330 There shall be no sharp or abrasive surfaces under lavatories and sinks. (CA T24 11B-606.5) (ADA 606.5) pg. 330
MAIN BLDG: WOMENS BATHROOM	Five (5) sink pipe assemblies under the sink is not securely insulated?	Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise

Facility Element	Findings	Corrective Action
		<p>configured to protect against contact.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg. 330</p> <p>There shall be no sharp or abrasive surfaces under lavatories and sinks.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg. 330</p>
MAIN BLDG:	Rooms 123 and 122 disabled sign <u>too high</u> at 49 "	<p>Visual characters shall be 40" min. above the finish floor or ground.</p> <p>(CA T24 11B-703.5.6) (ADA 703.5.6) pg. 376</p>
MAIN BLDG:	Window L/M disabled sign is <u>too short</u> at 32"	<p>Visual characters shall be 40" min. above the finish floor or ground.</p> <p>(CA T24 11B-703.5.6) (ADA 703.5.6) pg. 376</p>

HEARINGS BUILDING – 2007 19TH Street, Sacramento, CA

HEARINGS: Parking	Parking: Entry sign to parking lot sign name of agency to claim vehicle is missing.	An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR
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		<p>immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8) pg.170</p> <p>The additional sign shall not be less than 17" wide x 22" high. Fig. 4 (CA T24 11B-502.8.1) pg. 170</p> <p>The additional sign shall clearly state in letters with a min. height of 1" the following: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____." (CA T24 11B-502.8.2) pg. 170</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2) pg.170</p>
<p>HEARINGS: Parking Access aisle for accessible space minimum: 5' wide by 18' long?</p> <p>Persons with disabilities</p>	<p>Access aisle needed at parking spots leading to the side entry to the bldg.</p>	<p>Access aisle min. dimensions: 5' wide by 18' long.</p> <p>Fig. 12 (CA T24 11B-502.2) (ADA 4.6.3) pg. 176</p> <p>Parking spaces and access</p>

<p>forced to go behind cars?</p>		<p>aisles shall be designed so that persons using them are not required to travel behind parking spaces other than to pass behind the parking space in which they parked.</p> <p>(CA T24 11B-502.7.1) pg. 172</p>
<p>Do access aisles connect to the accessible path of travel?</p>		<p>Access aisles shall adjoin an accessible route.</p> <p>(CA T24 11B-502.3) (ADA 502.3) pg. 173</p>
<p>Is parking located as close as possible to entrance?</p>		<p>Parking spaces complying with the requirements of this section that serve a particular building or facility shall be located on the shortest accessible route from parking to an entrance complying with “Entrances” heading in Section 5, Accessible Routes - Scoping Requirements.</p> <p>(CA T24 11B-208.3.1) (ADA 208.3.1) pg. 172</p> <p>Where parking serves more than one accessible entrance, parking spaces complying with the requirements of this section shall be dispersed and located on the shortest accessible route</p>

		<p>to the accessible entrances.</p> <p>(CA T24 11B-208.3.1) (ADA 208.3.1) pg. 172</p> <p>In parking facilities that do not serve a particular building or facility, parking spaces complying with the requirements of this section shall be located on the shortest accessible route to an accessible pedestrian entrance of the parking facility.</p> <p>(CA T24 11B-208.3.1) (ADA 208.3.1) pg. 172</p>
HEARINGS: Front Entry	Front entry sign - hours of service sign not in threshold language.	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language.</p> <p>(Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40" max. Please see Table 57-5.</p> <p>(CA T24 11B-703.5) (ADA 703.5) pg. 379</p>

<p>HEARINGS: MEN'S BATHROOM</p>	<p>MENS BATHROOM: Two (2) sink pipe assemblies under the sink is not securely insulated.</p>	<p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg. 330</p> <p>There shall be no sharp or abrasive surfaces under lavatories and sinks.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg. 330</p>
<p>HEARINGS: WOMEN'S BATHROOM</p>	<p>WOMENS BATHROOM: Two (2) sink pipe assemblies under the sink is not securely insulated.</p>	<p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg. 330</p> <p>There shall be no sharp or abrasive surfaces under lavatories and sinks.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg. 330</p>

a. Recommendation

Submit a Corrective Action Plan and Correct all items identified

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages if the forms and materials are provided by CDSS in that language, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Comments
Does the county identify a client's language need upon first contact? How?	X		
Does the county use a primary language form?	X		
Does the client self-declare on this form?	X		

Question	Yes	No	Comments
Are non-English- or limited-English-speaking clients provided bilingual services?	X		
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X		
Does the county have a contracted language line provider, a county interpreter list, or any other interpreter process?	X		
Is there a delay in providing interpretive services?	X		
Are county interpreters certified?	X		
Does the county have adequate interpreter services?	X		
Does the county allow minors to be interpreters? If so, under what circumstances?	X		When the client is insistent to have a family member translate.
Does the county allow the client to provide his or her own interpreter?	X		
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X		
Does the county use a Release of Confidentiality Information form for client-provided interpreters?	X		
If there is not a Release of Confidentiality Information form,			

Question	Yes	No	Comments
how and where is the client-provided interpreter documented?	X		
Does the county use the CDSS-translated forms in the clients' primary languages?	X		
Is the information that is to be inserted into NOA translated into the client's primary language?	X		
If language to be inserted into NOA is not available, is there a procedure to ensure information translated to client's primary language?	X		
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X		
Does the county identify a client with a disability (physical, mental, or learning)?	X		
Does the county assist clients with self-identifying a disability	X		
Does the county have a policy and procedure in place for assisting clients with a disability (physical, mental, or learning)?	X		
Does the county offer reasonable accommodations to clients with a disability (physical, mental, or learning)?	X		

Question	Yes	No	Comments
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X		
Does the county offer a screening for learning disabilities?	X		
Is there an established process for offering a screening?	X		
Is the client identified as having a learning disability referred for an evaluation?	X		

B. Corrective Actions

None

C. Recommendation

None

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

How item is Documented Item	CalWORKs	CalFresh
Ethnic origin documentation	Sacramento County Department of Human Assistance is clearly documenting ethnic origin in client's informational pages.	Sacramento County Department of Human Assistance is clearly documenting ethnic origin in client's informational page
Method of identifying client's primary language	Sacramento County Department of Human Assistance at intake queries language requirements from the client.	Sacramento County Department of Human Assistance at intake queries language requirements from the client.
Method of documenting client's primary language	Sacramento County Department of Human Assistance at intake queries language requirements from the client and documents on language preference form.	Sacramento County Department of Human Assistance at intake queries language requirements from the client and documents on language preference form.
Method of providing bilingual services and documentation	Sacramento County Department of Human Assistance at intake identifies language preference and procures a certified interpreter. Documentation is the clients file.	Sacramento County Department of Human Assistance at intake identifies language preference and procures a certified interpreter. Documentation is the clients file.
Client provided own interpreter	The Client is advised of problems with providing their own interpreter.	The Client is advised of problems with providing their own interpreter.

How item is Documented Item	CalWORKs	CalFresh
Method to inform client of potential problem using own interpreter	The Client is verbally advised of problems with providing their own interpreter.	The Client is verbally advised of problems with providing their own interpreter.
Release of information to Interpreter	Only County Certified Interpreters and Telephonic Interpreter services are used. Confidentiality is controlled. Release form is given to client.	Only County Certified Interpreters and Telephonic Interpreter services are used. Confidentiality is controlled. Release form is given to client.
Individual's acceptance or refusal of written material offered in primary language	The client is offered the option to receive all written material in their language. If the client refuses, it is documented.	The client is offered the option to receive all written material in their language. If the client refuses, it is documented.
Documentation of minor used as interpreter	The client is advised of the loss or misinterpreted information if a minor is used as an interpreter. It is documented.	The client is advised of the loss or misinterpreted information if a minor is used as an interpreter. It is documented.
Documentation of circumstances for using minor interpreter temporarily	The client is advised of the loss or misinterpreted information if a minor is used as an interpreter. It is documented.	The client is advised of the loss or misinterpreted information if a minor is used as an interpreter. It is documented.
Method of identifying client's disability	At intake the client is questioned and given an opportunity to self-declare any disabilities or reasonable accommodation needs.	At intake the client is questioned and given an opportunity to self-declare any disabilities or reasonable accommodation needs.
Method of documenting clients' disability (physical, mental, or learning)	At intake the client's self-declaration is documented in the intake sheet and/or in the clients input screen.	At intake the client's self-declaration is documented in the intake sheet and/or in the clients input screen.

How item is Documented Item	CalWORKs	CalFresh
Method of offering a reasonable accommodation to the client with disability	At intake, the client is asked about language and reasonable accommodation. This is the time where the client can self-disclose any accommodations needed. With disclosure, client is offered referrals for assistance.	At intake, the client is asked about language and reasonable accommodation. This is the time where the client can self-disclose any accommodations needed. With disclosure, client is offered referrals for assistance.
Method of documenting clients' reasonable accommodation	At intake conversations and reasonable accommodations are document in the clients file for future reference.	At intake conversations and reasonable accommodations are document in the clients file for future reference.

B. Corrective Actions

None

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights, cultural awareness, Section 504, and ADA training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Comments
Are employees trained in the requirement of Section 504 and ADA?	X		
Do employees receive continued Division 21 Training?	X		

Interview questions	Yes	No	Comments
Do employees understand the county policy regarding a client's rights and procedure to follow when receiving a discrimination complaint?	X		
Does the county provide employees Cultural Awareness Training?	X		
Do the CSW's have an understanding of Multi-Ethnic Placement Act (MEPA)?	X		
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X		
Does the county provide training on how to identify clients with disabilities (physical, mental & learning)?	X		
Do employees receive training on reasonable accommodation for clients with disabilities?	X		
Do the employees understand the county policy regarding a client's right to a reasonable accommodation?	X		

B. Corrective Actions

None

C. Recommendations

None

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews, Civil Rights Coordinator, and Program Manager Surveys

Interview and review areas	Yes	No	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X		
Do the employees know who the Civil Rights Coordinator is?	X		
Do the employees know the location of the Civil Rights poster "Everyone is Equal... (Pub 86)" with information as to how and where the clients can file a discrimination complaint?	X		
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X		

B. Corrective Action

None

C. Recommendation

None

IX. VENDOR CONTRACTS

Counties are required to ensure contracted services with contractors, vendors, consultants, and other providers of service, who receive state or federal assistance, include the assurance of compliance agreement.

A. Contracts Review

Number of Contracts Reviewed	10
Number of Contracts w/Assurance of Compliance Agreement	10

B. Corrective Action

None

X. CALL CENTER EVALUATION

County Call/Service Centers are evaluated to ensure services provided are nondiscriminatory toward non-English speaking clients and clients with a disability (physical, mental, or learning).

A. Findings from Call/Service Center site visit and interviews.

Question	Yes	No	Comments
Does the county have a Call Center/Service Center?	X		
Is the Call Center/Service Center publically accessible to clients?	X		
Does the Call Center/Service Center answer calls for the entire county, by district, or regional office?	X		Call Center/Service Center answer calls for the entire by county.
Does the Call/Service Center have an Interactive Voice Response system?	X		

Question	Yes	No	Comments
Does the county have a Call Center/Service Center?	X		
If so, does the Interactive Voice Response system have language options for all county threshold languages?		X	The county has the ability to utilize Language Line services.
Does the Interactive Voice Response system have an option to request free interpretive services?	X		
Is the Call/Service Center accessible to clients with a disability (hearing impaired, physical, mental, or learning)?	X		Clients never physically access the Call/Service Center. This location is handled all telephonically. But the Center does have the ability to take hearing impaired calls. It handles difficulty in communication calls with great skill.
Does the Call/Service Center accommodate clients with a disability (physical, mental, or learning)?	X		Clients never physically access the Call/Service Center. This location is handled all telephonically. But the Center does have the ability to take hearing impaired calls. It handles difficulty in communication calls with great skill.
Are the Call/Service Center calls monitored for quality assurance?	X		
Does the Call/Service Center staff provide services to client's individual case?	X		

B. Observation

None

XI. COMMUNITY INPUT

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups. The following summarizes their observations, and will provide issues that the county management team can address to improve their operations from a civil rights perspective.

A. Major observations include:

➤ First 5 Sac

No Observations submitted

➤ NAMI Sacramento

No Observations submitted

XII. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Sacramento County Department of Human Assistance Civil Rights Compliance Plan for the period September 11, 2017 through September 10, 2018, was received on October 30, 2017. It is approved as submitted.

XIII. CONCLUSION

The CDSS reviewer found the Sacramento County Department of Human Assistance staff warm, welcoming, informative and very supportive. Particular thanks to Dawn Mason, Civil Rights Coordinator, for organizing the details of the review. In each District Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Sacramento County Department of Human Assistance in satisfactory compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that

expressed by management with respect to ensuring access, assistance, and compliance.

The Sacramento County Department of Human Assistance must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.